

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

3:17-32-TLW

Estate of Marion Fayne Anderson, Estate
No. 2015ES3200802, by Kerry Brown, its
personal representative,

Plaintiffs,

vs.

American International Group, Inc. a/k/a
AIG, and National Union Fire Insurance
Company of Pittsburgh, Pa.,

Defendants.

**NOTICE OF REMOVAL BY NATIONAL
UNION FIRE INSURANCE COMPANY
OF PITTSBURGH, PA**

Defendant National Union Fire Insurance Company of Pittsburgh, Pa. (hereafter “National Union”), by and through counsel, files this Notice of Removal to the United States District Court for the District of South Carolina, Columbia Division, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446.

National Union would respectfully show this Honorable Court:

1. This action was filed by the Plaintiff, Estate of Marion Fayne Anderson, Estate No. 2015ES3200802, by Kerry Brown, its personal representative (“Plaintiff”), in the Court of Common Pleas for Richland County, South Carolina on November 3, 2016, and assigned case number 2016-CP-40-06576. A copy of the Summons and Complaint are attached as Exhibit A.

2. National Union was served with Summons and Complaint through the South Carolina Department of Insurance on December 6, 2016. A copy of the Notice of Service of Process on National Union is attached hereto as Exhibit B.

3. The Plaintiff is a citizen and resident of the State of South Carolina, and is the personal representative of the Estate of Marion Fayne Anderson, filed in the Lexington County, South Carolina, Probate Court.

4. American International Group, Inc. is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in the State of New York. It has not been served with the summons and complaint, and has not made an appearance.

5. National Union is a corporation organized and existing under the laws of the State of Pennsylvania with its principal place of business in the State of New York.

6. This case is removable to federal court pursuant to 28 U.S.C. § 1441 as this Court has original jurisdiction over this action under 28 U.S.C. § 1332 in that there is complete diversity of citizenship between the parties and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

7. National Union has filed a copy of this Notice of Removal with the Clerk of Court for Richland County, South Carolina, and served counsel for Plaintiff.

WHEREFORE, National Union Fire Insurance Company of Pittsburgh, Pa. prays that this Court accept this Notice of Removal and that this Court take jurisdiction of the this case and all further proceedings in this case in the Court of Common Pleas for Richland County, South Carolina, be stayed.

[Signature on following page]

Respectfully submitted,
COLLINS & LACY, P.C.

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